

1 Glenn A. Danas (SBN 270317)  
2 gdanas@clarksonlawfirm.com  
Shireen M. Clarkson (SBN 237882)  
3 sclarkson@clarksonlawfirm.com  
Zarrina Ozari (SBN 334443)  
4 [zozari@clarksonlawfirm.com](mailto:zozari@clarksonlawfirm.com)  
**CLARKSON LAW FIRM, P.C.**  
5 22525 Pacific Coast Highway  
Malibu, CA 90265  
6 Tel: (213) 788-4050  
Fax: (213) 788-4070

7  
8 *Attorneys for Plaintiffs*

9  
10 Joshua B. Simon\*  
[jsimon@mwe.com](mailto:jsimon@mwe.com)  
Warren Haskell\*  
[whaskell@mwe.com](mailto:whaskell@mwe.com)  
Dmitriy Tishyevich (SBN 275766)  
[dtishyevich@mwe.com](mailto:dtishyevich@mwe.com)  
Josh J. Song\*  
[jsong@mwe.com](mailto:jsong@mwe.com)  
Chelsea Cosillos\*  
[ccosillos@mwe.com](mailto:ccosillos@mwe.com)  
**McDERMOTT WILL & EMERY LLP**  
One Vanderbilt Avenue  
New York, NY 10017-3852  
Tel: (212) 547-5400  
Fax: (212) 547-5444  
\*Admitted *Pro Hac Vice*

11  
12 *Attorneys for Defendants*

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14 **UNITED STATES DISTRICT COURT FOR THE**  
**EASTERN DISTRICT OF CALIFORNIA**

15 SUZANNE KISTING-LEUNG, SAMANTHA  
16 DABABNEH, RANDALL RENTSCH, and  
17 CHRISTINA THORNHILL, individually and on  
behalf of all other similarly situated,

18 Plaintiffs,

19 vs.

20 CIGNA CORPORATION, CIGNA HEALTH  
AND LIFE INSURANCE COMPANY, and  
21 DOES 1 through 50, inclusive,

22 Defendant.

23 Case No. 2:23-cv-01477-DAD-KJN

24  
25 **JOINT STIPULATION TO CONTINUE**  
**DEFENDANTS' MOTION TO DISMISS**  
**HEARING AND EXTEND BRIEFING**  
**SCHEDULE**

26 SAC Filed: December 18, 2023  
Judge: Hon. Dale A. Drozd  
Trial Date: Not Set

1 Plaintiffs Suzanne Kisting-Leung, Samantha Dababneh, Randall Rentsch, and Christina  
2 Thornhill, and Defendants Cigna Corporation and Cigna Health and Insurance Company, by and  
3 through their undersigned counsel, hereby stipulate as follows:

4 **WHEREAS**, Plaintiffs filed their Class Action Complaint (“Original Complaint”) in this action  
5 on July 24, 2023;

6 **WHEREAS**, Defendants filed an unopposed motion for administrative relief for an extension  
7 of time to answer, move, or otherwise respond to the Original Complaint on August 7, 2023;

8 **WHEREAS**, the Court granted Defendants’ unopposed motion for administrative relief for  
9 extension of time to answer, move, or otherwise respond to the Original Complaint and set the  
10 deadline for Defendants to file a response to the Original Complaint by September 29, 2023;

11 **WHEREAS**, on September 14, 2023, the parties filed the joint stipulation for leave for  
12 Plaintiffs to file the First Amended Class Action Complaint (“FAC”) by October 16, 2023;

13 **WHEREAS**, the Court granted the joint stipulation to allow Plaintiffs to file the FAC by  
14 October 16, 2023;

15 **WHEREAS**, Plaintiffs filed their FAC on October 16, 2023;

16 **WHEREAS**, on November 28, 2023, the parties filed the joint stipulation for leave for  
17 Plaintiffs to file the Second Amended Class Action Complaint (“SAC”) by December 18, 2023;

18 **WHEREAS**, Plaintiffs filed their SAC on December 18, 2023;

19 **WHEREAS**, Defendant filed their Motion to Dismiss on February 1, 2024, and set the hearing  
20 date for June 4, 2024;

21 **WHEREAS**, Plaintiffs’ Opposition to Defendants’ Motion to Dismiss is due on February 15,  
22 2024;

23 **WHEREAS**, the Parties met and conferred and agreed to continue the hearing date and agreed  
24 to extend the briefing schedule as follows:

- 25 1. Plaintiffs may have an extension until May 6, 2024 to file and serve their opposition to  
26 Defendants’ Motion to Dismiss.  
27 2. Defendants shall file and serve their reply brief by May 28, 2024.

3. Defendants' Motion to Dismiss Hearing will be continued from June 4, 2024 to June 18, 2024.

Respectfully submitted,

DATED: February 9, 2024

## **CLARKSON LAW FIRM, P.C.**

By: /s/ Glenn Danas  
Glenn A. Danas (SBN 270317)  
gdanas@clarksonlawfirm.com  
Shireen M. Clarkson (SBN 237882)  
sclarkson@clarksonlawfirm.com  
Zarrina Ozari (SBN 334443)  
zozari@clarksonlawfirm.com  
22525 Pacific Coast Highway  
Malibu, CA 90265  
Tel: (213) 788-4050  
Fax: (213) 788-4070

*Attorneys for Plaintiffs*

DATED: February 9, 2024

# McDERMOTT WILL & EMERY LLP

By: /s/ Dmitriy Tishyevich  
Joshua B. Simon  
[jsimon@mwe.com](mailto:jsimon@mwe.com)  
Warren Haskel  
[whaskel@mwe.com](mailto:whaskel@mwe.com)  
Dmitriy Tishyevich (SBN 275766)  
[dtishyevich@mwe.com](mailto:dtishyevich@mwe.com)  
Josh J. Song  
[jsong@mwe.com](mailto:jsong@mwe.com)  
Chelsea Cosillos  
[ccosillos@mwe.com](mailto:ccosillos@mwe.com)  
One Vanderbilt Avenue  
New York, NY 10017-3852  
Tel: (212) 547-5400  
Fax: (212) 547-5444

*Attorneys for Defendants*

**[PROPOSED] ORDER**

The Court having reviewed the parties' Joint Stipulation to Continue Defendants' Motion to Dismiss Hearing and Extend Briefing Schedule, and for good cause appearing, **IT IS HEREBY ORDERED** that Defendant's Motion to Dismiss hearing is set for June 18, 2024 at 1:30 P.M.

**IT IS FURTHER SO ORDERED** that Plaintiffs' opposition shall be filed on or before May 6, 2024 and Defendants' reply shall be filed on or before May 28, 2024.

## **IT IS SO ORDERED**

DATED: \_\_\_\_\_, 2024

Honorable Dale A. Drozd  
United States District Judge